

DOCKET NO. 98-100 ORIGINAL

BEFORE THE

**Federal Communications Commission**

WASHINGTON, D.C. 20554

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SEP 23 1998

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

In the Matter of	)	
	)	
Informal proposals of the Personal	)	WT Docket No. 98-20
Communications Industry	)	WT Docket No. 98-100
Association for streamlining	)	DA 98-1687
the wireless regulations	)	

**COMMENTS OF  
FIXED POINT-TO-POINT COMMUNICATIONS SECTION,  
WIRELESS COMMUNICATIONS DIVISION OF THE  
TELECOMMUNICATIONS INDUSTRY ASSOCIATION**

The Fixed Point-to-Point Communications Section, Wireless Communications Division, of the Telecommunications Industry Association (the "Fixed Section")<sup>1</sup> hereby comments in response to the Commission's August 21, 1998 Public Notice, DA 98-1687,<sup>2</sup> on a July 31, 1998 letter from the Personal Communications Industry Association (PCIA) proposing a number of rule changes aimed at eliminating or streamlining certain regulations governing the wireless services.

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<sup>1</sup>The Telecommunications Industry Association ("TIA") is the principal industry association representing telecommunications equipment manufacturers, including manufacturers of terrestrial fixed point-to-point microwave radio service ("FS") equipment. Fixed Section members serve, among others, companies, including telephone carriers, utilities, railroads, state and local governments, and cellular carriers, licensed by the Commission to use private and common carrier bands for provision of important and essential telecommunications services. This comment reflects only the views of the Fixed Point-to-Point Section.

<sup>2</sup>The Public Notice was published in the Federal Register on September 8, 1998 at 63 Fed. Reg. 47460. Comments were requested within fifteen days from that date.

The Fixed Section represents manufacturers producing equipment used in terrestrial point-to-point microwave communications systems, private as well as commercial. Those systems are governed primarily by the rules in Part 101 of the Commission's Rules. The comments below, therefore, are confined to PCIA's suggestions as they relate to Part 101.

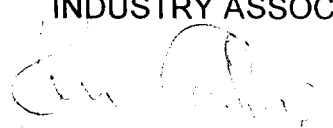
The Fixed section agrees with PCIA that the Commission and the industry should review regulatory requirements on an ongoing basis and eliminate those no longer necessary or useful and streamlining others. This seems to be PCIA's objective in its July 31, 1998 filing and the Fixed Section agrees with that objective. However, given that only extremely limited Commission resources have been allocated by the Commission for the terrestrial microwave services, The Fixed Section believes that the Commission must first address the several important pending substantive and procedural matters begging for the Commission's attention before diverting any of its limited resources to PCIA's worthwhile, but less pressing, suggestions. The pending matters requiring immediate Commission attention include: the petition for reconsideration filed in 1966 by the Fixed Section in WT Docket 94-148, where the microwave rules were consolidated in Part 101; the petition for rulemaking also filed by the Fixed Section earlier this year proposing, among other things, to restructure the 21-23 GHz band for its more efficient and effective use (which petition has yet to be assigned a RM number or placed on public notice); the extreme shortage of frequency spectrum facing the terrestrial microwave services brought about by the reallocation of microwave spectrum to other services and by the increasing requirements for microwave facilities by competitive carriers; the intractable problems engendered by the

increased shared use of microwave bands by terrestrial microwave and satellite systems; and, of course, the continuing and growing backlog of microwave applications. The Commission's failure to address these matters and its application backlog has had a stifling effect not only on the microwave manufacturing industry but also on the many users of microwave systems as well as on the new wireless communications services the Commission has established and is promoting.

It is vitally important, therefore, that the Commission address the pending microwave matters and reduce the serious application backlog first before devoting any significant personnel to PCIA's July 31, 1998 filing.


Respectfully submitted

FIXED POINT-TO-POINT COMMUNICATIONS  
SECTION WIRELESS COMMUNICATIONS  
DIVISION OF THE TELECOMMUNICATIONS  
INDUSTRY ASSOCIATION

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Section Wireless Communications Division of  
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Eric Schimmel, Vice President  
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